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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Lance Downes-Covington, an individual,

Plaintiff,

vs.

City of Las Vegas, a political subdivision of  
the state of Nevada; Sergio Guzman, in their  
individual capacity; Sarkis Jopalian, in their  
individual capacity; Paul Hartz, in their  
individual capacity; Janelle Mazza, in their  
individual capacity; and Doe Las Vegas City  
Marshals 1-10, in their individual capacity,

Defendants.

CASE NO. 2:25-cv-0737-JAD-BNW

**STIPULATION AND PROPOSED ORDER TO CONTINUE  
DEADLINE TO SUBMIT DISCOVERY PLAN AND SCHEDULING ORDER  
(SECOND REQUEST)**

Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Plaintiff Lance Downes-Covington, and Defendants City of Las Vegas, Sergio Guzman, Sarkis Jopalian, Paul Hartz and Janelle Mazza, through their respective counsel, stipulate to extend the deadline for the parties to submit a proposed Discovery Plan and Scheduling Order for another period of thirty (30) days.

This is the second request for an extension of a discovery-related deadline. The requested extension is in good faith and not for purposes of undue delay. The request is submitted at least twenty-one (21) days or more before the expiration of the current deadline of August 28, 2025.

1 The parties are making progress towards the informal exchange of information to assist  
 2 with substantive resolution discussions. To continue that process in good faith, and in order to  
 3 focus the parties' time and resources on potential resolution of this matter, the parties wish to  
 4 again continue the deadline to submit their proposed Discovery Plan and Scheduling Order, and  
 5 related deadline to complete a Rule 26(f) conference. The parties propose the following  
 6 continuation of dates.

7 **1. Deadline to conduct Rule 26(f) Conference.**

8 The parties' current deadline to complete their Rule 26(f) conference is August 13, 2025.  
 9 The parties request that the Court extend that deadline to **September 12, 2025.**

10 **2. Deadline to submit proposed Discovery Plan and Scheduling Order.**

11 The parties' current deadline to submit a proposed Discovery Plan and Scheduling Order  
 12 is August 28, 2025. The parties request that the Court extend that deadline to **September 29,**  
 13 **2025.**

14 By way of this extension request, the parties request that the future triggering date for  
 15 purposes of setting discovery deadlines also be continued by thirty (30) days. Specifically,  
 16 Defendants' appearance date of July 14, 2025, will be applied as Wednesday, August 13, 2025,  
 17 for purposes of calculating future deadlines based on the Defendants' first appearance.

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1 The parties make this stipulation in good faith and not for the purposes of undue burden  
2 or delay.

3 IT IS SO STIPULATED.

4 DATED this 16th day of July, 2025.

DATED this 16th day of July, 2025.

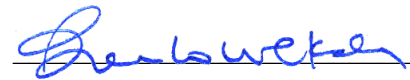
5 ACLU OF NEVADA

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14 IT IS SO ORDERED.

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17 7/18/2025

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